APR 08 1982

Mr. Donald Malvern
Executive Vice President
McDonnell Douglas Corporation
P.O. Box 516
St. Louis, Missouri 63166

EPA I.D. No.: MOD000818963

FACILITY LOCATION: Brown Road at Lindbergh Hazelwood, Missouri 63145

Dear Mr. Malvern:

This letter constitutes a formal request for four (4) copies of Part B of your application for a hazardous waste facility permit under the Resource Conservation and Recovery Act for McDonnell Douglas Corporation, St. Louis, Missouri. This request is made under the authority of 40 Code of Federal Regulations (CFR), §122.22(b). You can also expect a letter from the Missouri Department of Natural Resources concerning your State permit in the near future.

Enclosed for your reference is a list of the items which constitute a Part B application as applicable to your facility type. These items must be submitted with a postmark dated no later than October 6, 1982. If any of this information is being submitted under a claim of confidentiality, please indicate this fact. Guidance concerning confidentiality requests is attached. For more information on confidentiality, see 40 CFR Part 2 (especially 40 CFR 2.305).

If your firm stores or treats hazardous wastes in underground tanks, special consideration may apply. Regulations under Part 264 do not apply if the underground facilities cannot be entered for inspection. If your firm operates any underground storage or treatment tanks, the options for the facility operator are as follows:

- 1. The operator can voluntarily choose to install manholes for inspection, or discontinue the use of the tanks which cannot be inspected.
- 2. The operator can continue to utilize those tanks under the interim status standards until such time as Part 264 regulations are promulgated.

If option two is chosen, your firm will face a second permitting action after future regulations dealing with underground tanks are promulgated. These new regulations are expected in the fall of 1983.

We plan to hold a pre-application workshop on May 4, 1982, to discuss the application requirements in more detail. It will be held at the Missouri Department of Natural Resources offices, Upstairs Conference Room, 1915 South Ridge Drive, in Jefferson City, Missouri. The workshop is scheduled to start at 9:30 a.m. We expect the general session and the individual question and answer sessions to be completed by 4 p.m. We will call you on or about April 20, 1982, to determine if you and/or your staff will be able to attend the workshop as scheduled.

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The attendance by you or appropriate members of your staff at this workshop should help improve the quality of your firm's application and thus help minimize processing and review time. A representative of a consulting engineering firm, if you have retained one, can also be invited to attend this meeting along with you and/or your staff. This workshop is being offered as an aid and service to your firm; the timing of the workshop should not be used as a reason to delay starting the development of information for submitting your Part B application. The application due date noted above is firm and will not be modified. Please note under Section 122.22(a)(5) that the failure to furnish a requested Part B application on time, or to furnish in full the information required by the Part B application, is grounds for termination of interim status under Part 124. Your cooperation in trying to improve hazardous waste management facility operations in Missouri is appreciated.

Should you have any questions about these requirements, please contact Bob Stewart at (816) 374-6531.

Sincerely yours,

David A. Wagoner Director, Air and Waste Management Division

Enclosures: List of Part B Requirements

Part 264 Standards (applicable to Storage Facilities)

Part 122 Standards, Subpart B Only

Guidance Regarding Confidential Information

Changes to Container Storage Regulations (264.175, 264.250

and 122.25), Federal Register, November 6, 1981, p. 55110-55113

Changes to 122.25(11), Federal Register, November 23, 1981,

p. 57284-57286.

Guidance on Part B Requirements, 122.25(15)-(18)

cc: Mr. John Doyle, MDNR

bcc: Chet McLaughlin, SPRS
Michael Sanderson, AWCM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 324 EAST ELEVENTH STREET KANSAS CITY, MISSOURI - 64106

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